

UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF OKLAHOMA

(1) VICTOR VELAZQUEZ, an individual,	)	
	)	
Plaintiff,	)	
	)	
vs.	)	Case No. 15-cv-00017-CVE-TLW
	)	
(1) HELMERICH & PAYNE	)	
INTERNATIONAL DRILLING CO.,	)	
a Domestic For-Profit Corporation,	)	
	)	
Defendant.	)	

**NOTICE OF REMOVAL**

TO: PLAINTIFF VICTOR VELAZQUEZ AND  
HIS ATTORNEYS OF RECORD

Pursuant to 28 U.S.C. §§ 1441(a), (c) and 1446, and LCvR 81.2, Defendant, Helmerich & Payne International Drilling Co., Inc., hereby files with this Court its Notice of Removal from the District Court of Tulsa County, State of Oklahoma, Case No. CJ-2014-4425, which is styled *Victor Velazquez, an individual, Plaintiff, v. Helmerich & Payne International Drilling Co., a Domestic For-Profit Corporation, Defendant.*

The following statements are submitted pursuant to 28 U.S.C. § 1446:

1. Pursuant to LCvR 81.2 of the United States District Court for the Northern District of Oklahoma, copies of all matters filed of record in the state court proceeding or served upon Helmerich & Payne International Drilling Co., Inc. are attached hereto along with a copy of the docket sheet, and all such matters include the following:

- a. Summons issued to Helmerich & Payne International Drilling Co.;
- b. Plaintiff's Petition.
- c. Return of Service on Helmerich & Payne International Drilling Co.

2. Plaintiff alleges a cause of action for violation of Title VII of the Civil Rights Act of 1964, as amended. *See* Petition, ¶¶ 25-27.

3. Plaintiff alleges a cause of action for violation of 42 U.S.C. § 1981. *See* Petition, ¶¶ 31-32.

4. This Court has original jurisdiction of this action pursuant to 28 U.S.C. § 1331.

WHEREFORE, Defendant, Helmerich & Payne International Drilling Co., Inc., prays that the above action now pending against it in the District Court of Tulsa County, State of Oklahoma, be removed to this Court.

Respectfully submitted,

**NEWTON, O'CONNOR, TURNER & KETCHUM  
A PROFESSIONAL CORPORATION**

By: /s/ W. Kirk Turner

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**ATTORNEYS FOR DEFENDANT,  
HELMERICH & PAYNE INTERNATIONAL  
DRILLING CO., INC.**

**CERTIFICATE OF SERVICE**

- ☒ I hereby certify that on January 9, 2015, I electronically transmitted the foregoing document to the Clerk of Court using the ECF System for filing and transmittal of a Notice of Electronic Filing to the following ECF registrants:

Benjamin Oxford, Esq.  
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- ☐ I hereby certify that on \_\_\_\_\_, 2015, I served the foregoing document by mail on the following, who are not registered participants of the ECF System (None):

/s/ W. Kirk Turner  
W. Kirk Turner